

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO. 7:20-CR-167-5M2

UNITED STATES OF AMERICA

v.

JOSEPH MAURINO

**MOTION TO MODIFY TERMS OF
PRE-TRIAL RELEASE**

NOW COMES the Defendant and moves to modify the terms of pre-trial release as follows:

1. The Defendant, having pled guilty, was released following his arraignment on about April 11, 2023 and remains on pre-trial conditions in the District of New Jersey.
2. The Defendant, upon information and belief, has not violated the terms of his pre-trial release while on pre-trial release since August 2021.
3. The Defendant requests that he be permitted to travel to his extended family member's house in Shrewsbury Boro, NJ to celebrate Christmas with his family on December 25, 2023 to leave his house no later than 2:00 pm and return no later than 10:00 pm.
4. The Government and its agencies do not object to the Defendant's request.

WHEREFORE, the Defendant respectfully moves this Court to temporarily modify the pre-trial conditions as described above.

This the 20th day of December 2023.

/s/ Damon Chetson
Damon J. Chetson
Counsel for the Defendant (Retained)
NC Bar #39575
19 W. Hargett St., Suite 508
Raleigh, NC 27601
Office: (919) 352-9411
Fax: (919) 887-7269
E-Mail: damon@chetson.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading was served upon opposing counsel by
via CM/ECF.

This the 20th day of December 2023.

/s/ Damon Chetson

Damon J. Chetson

Counsel for the Defendant (Retained)

NC Bar #39575

19 W. Hargett St., Suite 508

Raleigh, NC 27601

Office: (919) 352-9411

Fax: (919) 887-7269

E-Mail: damon@chetson.com